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16 **UNITED STATES DISTRICT COURT FOR THE**  
17 **EASTERN DISTRICT OF CALIFORNIA**

18  
19 SIERRA SNOWMOBILE FOUNDATION, ) Case No.: 2:21-CV-01913-JAM-DB  
et al., )  
20 Plaintiffs, ) **DECLARATION OF DAVID PAGE**  
21 vs. ) Hearing Date: January 10, 2023  
22 UNITED STATES FOREST SERVICE, et al., ) Hearing Time: 1:30 p.m. PT  
23 ) Judge: Honorable John A. Mendez  
24 Defendants, )  
25 and )  
26 WILDEARTH GUARDIANS, et al., )  
27 Intervenor-Defendants. )  
28

1 I, David Page, hereby declare as follows:

2       1. I live in Mammoth Lakes, California.

3       2. I am a writer, backcountry skier and outdoor recreationist, Senior Policy Advisor for  
4 Outdoor Alliance California, and the Executive Director of Winter Wildlands Alliance.

5       3. I am a member of the California Wilderness Coalition (CalWild). I support this  
6 organization because they work hard to track and inform members about land management and  
7 conservation issues across the state, and because they advocate for responsible conservation-minded  
8 public land management.

9       4. I use public lands almost every day for recreation and retreat. Depending on the  
10 season, I regularly run, hike, paddleboard, camp, mountain bike and backcountry ski both in the  
11 front-country wildland-urban interface and on remote and wild backcountry landscapes on a variety  
12 of national forest units across California, especially in the Sierra Nevada, in large part as an antidote  
13 to the time I otherwise have to spend on a computer or driving in cars.

14       5. I visited the Stanislaus National Forest for several days in January of this year to  
15 backcountry ski and winter camp and to explore some of the excellent backcountry ski terrain in the  
16 Pacific Valley Near Natural Area, especially that area that was not designated for motorized use in  
17 the new Stanislaus National Forest Over-Snow Vehicle (OSV) Use Designation plan. I will be  
18 visiting the area again this summer for camping and hiking, and also very much look forward to  
19 doing more backcountry exploration on skis this coming winter.

20       7. The following photograph shows U.S. Forest Service signs posted just beyond the  
21 Lake Alpine Sno-Park winter trailhead at the start of the groomed, shared-use winter trail on CA  
22 Highway 4, which is the main winter access point from Bear Valley to the remaining non-motorized  
23 zones in the Pacific Valley Near Natural Area. I took this photograph on January 24, 2022.

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8. The following is a zoomed-in version of that same photograph to show the text on the white sign.



1       9. While I respect the compromise that the new OSV plan represents for this area, and  
2 while my organization and its stakeholders are not Intervenors in this case and are committed to  
3 working with the Forest Service to implement the new plan, I personally fear the plan does not go  
4 far enough to protect quiet landscapes, wildlife, and wildlife habitat in this Near Natural Area, nor  
5 to minimize conflict between motorized and non-motorized winter uses. As is reflected on the sign  
6 captured above (see second bullet point: “WILDERNESS AND NEAR NATURAL AREAS ARE  
7 FOR THE ENJOYMENT OF NON MOTORIZED USERS ONLY”), the whole of the Pacific  
8 Valley Near Natural Area, a wild and roadless area adjacent to the Carson-Iceberg Wilderness that  
9 is also one of the last redoubts of a small and critically endangered population of Sierra Nevada Red  
10 Fox, has since the 1991 forest plan been designated off-limits to all motorized use without  
11 exception for winter over-snow vehicle use. That the forest has now designated large portions of  
12 this area as open to cross-country OSV play, simply because an increasing number of users have  
13 over the years ignored forest plan direction, seems only to reward repeated violation and trespass, to  
14 invite further impacts to resources and wildlife, and to further exacerbate rather than minimize  
15 conflict between different uses.

16      10. To this point, it must be noted that on the same day that I took the above photograph  
17 (January 24), I followed a set of (probably week-old) OSV tracks that trespassed cross-country deep  
18 into the heart of the non-motorized area to the east and south of Pacific Creek all the way to the  
19 ridge below the rocky summit of Lookout Peak (see the following photograph, for which I also have  
20 time-stamped geospatial data). This trespass was clearly in violation of the new OSV plan. The fact  
21 that in the new plan and on the new OSVUM the boundary between the newly designated motorized  
22 area along Pacific Creek does not conform in any obvious way to topographical or other easy-to  
23 recognize landscape features, along with the fact that there was no signage to indicate where OSV  
24 use is now allowed or not allowed, clearly serves only to invite ongoing trespass. Not only has the  
25 forest effectively opened significant portions of a previously non-motorized Near Natural Area to  
26 winter cross-country motorized recreation, it has also—thus far, based on what I saw this past  
27 January—shown very little effort toward educating the public about or enforcing its new plan to  
28 protect the remaining non-motorized portions of the Near Natural Area.



Dated: July 29, 2022

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David Page".

David Page  
PO Box 100-460  
Mammoth Lakes, CA 93546

**CERTIFICATE OF SERVICE**

I hereby certify that on this 29th day of July 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which in turn automatically generated a Notice of Electronic Filing to all parties in the case who are registered users of the CM/ECF system, causing the following counsel to be served by electronic means:

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Dated: July 29, 2022

/s/Lauren M. Rule

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Lauren M. Rule